

Exhibit B1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

DECLARATION OF STEVEN T. COTTREAU

I, Steven T. Cottreau, pursuant to 28 U.S.C. § 1746 declare under penalty of perjury the following:

1. I am an attorney admitted to practice in the Southern District of New York in the above-captioned matter titled In re: Terrorist attacks on September 11, 2001, 03-mdl-1570 (GBD) (SN) (“In re 9/11 Litigation”). I am a partner at Jones Day and counsel to defendant Dubai Islamic Bank in the above-captioned multi-district litigation.

2. I am submitting this declaration in response to the Court’s August 30, 2021 Order (ECF No. 7082).

3. I am aware of and have reviewed the relevant Protective Orders in the In re 9/11 Litigation, including the Court’s general Protective Order (ECF No. 1900) and the Privacy Act Order and Protective Order for FBI Documents (FBI Protective Order) (ECF No. 4255).

1. No Receipt of the al-Jarrah Deposition Transcript

4. In connection with my representation of Dubai Islamic Bank in the In re 9/11 Litigation, I attended portions of the remote deposition of Musaed al-Jarrah on June 17 and 18, 2021.

5. I have never possessed nor have I ever directed anyone to obtain copies of the rough or final written transcripts or video of Musaed al-Jarrah’s deposition. Thus, I also have never shared with anyone the rough or final written transcripts or video of Musaed al-Jarrah’s deposition.

6. During the deposition, I was excluded from portions of the testimony that were protected under the FBI Protective Order (ECF No. 4255). During those protected portions, I was placed in a breakout room and was unable to hear or see Musaed al-Jarrah's testimony, including over video or through Realtime transcription services.

7. I did not use Realtime transcription services during Musaed al-Jarrah's deposition.

8. I did not take any notes on the content of Musaed al-Jarrah's deposition. Prior to August 1, 2021, I did not discuss the contents of Musaed al-Jarrah's deposition other than with Eric Snyder, Abigail Bosch, and Gabrielle Pritsker.

2. No Direct or Indirect Communications with Michael Isikoff

9. From June 1, 2021 through August 1, 2021, I have not communicated directly or indirectly with Michael Isikoff or anyone acting on his behalf about any topic, including about the contents of Musaed al-Jarrah's deposition.

3. Investigation of Protective Orders Breach

10. In response to this Court's order of August 30, 2021 (ECF No. 7082), I have led the efforts of counsel for Dubai Islamic Bank to investigate the source of the leak to Michael Isikoff and to determine whether anyone on the legal team defending Dubai Islamic Bank possessed transcripts of Musaed al Jarrah's deposition. I have communicated personally with all team members working on this matter for Dubai Islamic Bank at both Jones Day and our co-counsel Quinn Emanuel Urquhart & Sullivan, LLP to confirm the following facts.

11. I have asked every member of the legal team representing Dubai Islamic Bank to search for and determine whether anyone on our team has ever possessed a rough or final transcript of Musaed al-Jarrah's deposition. Each member of the team has confirmed that we have never

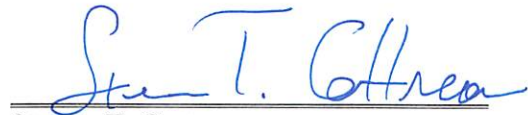
received or possessed a rough or final copy of the transcript or video of Musaed al-Jarrah's deposition.

12. I have also reviewed the invoices to our legal team from Golkow Litigation Services, LLC, which provided court reporting services for Musaed al-Jarrah's deposition. Those invoices reflect only charges for the Realtime transcript accessed only by Abigael Bosch (and which is addressed in her declaration submitted to this Court). The invoices contain no charges for a rough or final transcript of the deposition.

13. The only members of the team representing Dubai Islamic Bank who had any knowledge of the substance of Musaed al Jarrah's deposition prior to August 1, 2021 are (a) deposition attendees Abigael Bosch, Eric Snyder, and myself and (b) attorney Gabrielle Pritsker, who communicated about the deposition with other Jones Day attendees. All four of these Jones Day attorneys are submitting declarations in response to this Court's order. Those declarations confirm that each team member with any knowledge of the deposition of Musaed al Jarrah has (a) never possessed a rough or final copy of the transcript or video of Musaed al Jarrah's deposition and (b) never had any direct or indirect communications with Michael Isikoff or anyone acting on his behalf about any topic, including about the contents of Musaed al-Jarrah's deposition, from June 1, 2021 through August 1, 2021.

14. I also worked with Jones Day's IT Department to conduct a search of the firm's email servers for all emails sent from or to any Jones Day lawyer or staff member from June 1, 2021 through August 1, 2021. After conducting that search, Jones Day's IT department found no emails on Jones Day's email servers from or to (including in the to, cc, and bcc fields) the email addresses misikoff@yahoo-inc.com or misikoff@oath.com.

Pursuant to 28 U.S.C. §1746, I, Steven Cottreau, declare under penalty of perjury that the foregoing is true and correct. Executed on September 27, 2021.



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